

## REMARKS

The Office Action of August 27, 2003 has been received and its contents carefully reviewed. In light of the above amendments and for the reasons set forth below, reconsideration of this application is respectfully requested.

Initially, the Applicants note that the Office Action Summary (PTOL-326) form indicates at box 13(c)(1) that "None of: Certified copies of the priority documents have been received." However, a review of the Applicants' file record reveals that a Claim for Convention Priority w/Cert. of Mailing and the certified copy of Denmark Application No. PA 2000 01930 were received by the USPTO on April 5, 2002, as evidenced by the attached copy of the Claim for Convention Priority, copy of the first page of the Denmark Application No. PA 2000 01930 and copy of a properly completed and USPTO date stamped postcard indicating such receipt. Since it is apparent that each of the other submissions of April 5, 2002, e.g., the executed Declaration and Claim for Convention Priority, have reached the application file, it is clear that the certified copy of Denmark Application No. PA 2000 01930 has been lost or misplaced by the USPTO. Therefore, it is respectfully requested that the USPTO conduct a search for the missing the certified copy of Denmark Application No. PA 2000 01930 and/or request another copy of that document, through the USPTO Scientific and Technical Information Center, for the Examiner's review. Further, it is requested that the Examiner indicate receipt by the USPTO of the certified copy of Denmark Application No. PA 2000 01930 in the next Office Action.

The Applicants respectfully traverse the rejections of:

Claims 1-3, under 35 U.S.C. § 102 (e), as being anticipated by the teachings of published patent document JP ('292) to Tachibana et al., and

Claims 1-2, under 35 U.S.C. § 102(b), as being anticipated by the teachings of the Applicants' Admitted Prior Art (Specification, pages 1-2), set forth at pages 2-3 of the Office Action.

As can be seen from the translation of Tachibana et al. attached to this amendment, the patentees' vibrationally dampened support apparatus (Figure 3) for a turbine (1) and generator (2) is composed of a top frame (Figures 1, 3, element 20) constructed of a plurality of one piece H-shaped steel members which are welded to together, with welding

ribs (25,27), to form an integral unit. Thereafter, the tops of the one piece, H-shaped, welded members are machined to provide a smooth surface. The bottom frame (Figure 3, element 23') of Tachibana et al. only shows a transverse member (23') which extends between to support legs. There is no discussion of the exact structure of the bottom frame (23'), and, further, neither the top frame (20) or the bottom frame (23') are stated to include "bottom plates arranged in parallel one above another and forming a basic shape of a bottom of the main frame, the bottom plates being interconnected by at least two... longitudinal plates and a plurality of...transverse plates extending between the longitudinal plates" as presently set forth in claims 1 and 5.

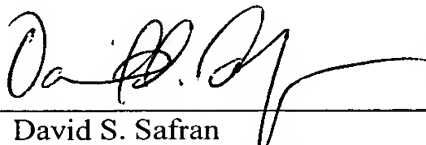
Further, neither the top frame (20) or the bottom frame (23') of Tachibana et al. are disclosed as being connected by uninterrupted longitudinal and transverse plates, as presently disclosed in the Figure 4 and set forth in present claims 1 and 6. The top frame (20) of Tachibana et al. requires many dozens of connecting welds and the machining of the welded unit to form a smooth surface from the welded top flange of the H-shaped members. In contrast, the main frame of the present invention utilizes discrete top and bottom plates arranged one above another in parallel arrangement which are then interconnected using (uninterrupted) longitudinal members and transverse members which extend between and are connected to the longitudinal members to form a rigid unit capable of resisting the vibrations of the vibration arrangement. Further, since the bottom frame and top frame of the invention (see claims 1, 5 and 6) utilize the discrete top and bottom plates and (uninterrupted) longitudinal/transverse members, the design is simpler, requires fewer welds and will be stronger than the multiple top and bottom plates of Tachibana et al. (formed by the tops and bottoms of a multitude of H-shaped members). This is principally due to the main frame of the claimed invention employing discrete top and bottom plates which are each interconnected by the longitudinal and transverse members.

Since turbine/generator support apparatus of Tachibana et al. does not expressly or implicitly teach all of the claimed features of the independent claims 1 and 5, anticipation cannot exist, and consequently, the rejection of claims 1-3, under § 102(e), as being anticipated by the teachings of Tachibana et al. is no longer appropriate and must be withdrawn.

Turning to the teachings of the Applicants' Admitted Prior Art (AAPA), set forth at pages 1 and 2 of the specification and Figure 3, the AAPA illustrates, like Tachibana et al., the use of one piece H-shaped beams and welding ribs to form the bottom frame from separate longitudinal and transverse beams welded together at welds (38). There is no disclosure of utilizing the discrete top and bottom plates as presently claimed which are interconnected by (uninterrupted) longitudinal and transverse members which extend between and are connected to the longitudinal members. Since the teachings of the AAPA also do not set forth each and every feature of the independent claims 1 and 5, the rejection of claims 1-2, under § 102 (b), as being anticipated by the teachings of the AAPA is no longer appropriate and must be withdrawn.

While the present application is now believed to be in condition for allowance, should the Examiner find some issue to remain unresolved, or should any new issues arise, which could be eliminated through discussions with Applicants' representative, then the Examiner is invited to contact the undersigned by telephone in order that the further prosecution of this application can thereby be expedited.

Respectfully submitted,

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